

**From:** Bowman, Randal  
**To:** [McAlear, Christopher](#)  
**Cc:** [Nikki Moore](#)  
**Subject:** Public comment for consideration  
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While this was classified as a Bears Ears comment, it really addressed issues at GSE and Canyons of the Ancients. As your folks have time, could you look at these and prepare a response for those two monuments. Thanks

As a member of the American Motorcyclist Association and an off-highway vehicle recreation enthusiast, I applaud the U.S. Department of the Interior for the opportunity to comment on its review of certain National Monuments designated or expanded since 1996 under the American Antiquities Act of 1906, to implement Executive Order 13792 of April 26.

Excerpts from an AMA guest blog written by Clif Koontz address the Grand Staircase-Escalante, Canyons of the Ancients and Bears Ears National Monuments. Koontz is the executive director of Ride with Respect, a nonprofit organization based in Moab, Utah, that conserves shared-use recreation through trail work and education.

Koontz states, "The Grand Staircase-Escalante National Monument closed half of the existing routes open to motorized recreation. The federal land managers even prohibited off-highway motorcyclists from riding the graded, gravel roads." He added, "Fortunately, the affected county asserted its jurisdiction over those roads, but not before having to fight the federal land managers in court."

At the Canyons of the Ancients National Monument, Koontz says, federal land managers first closed the single-track trails, then prohibited motorcycles from "motorcycle trails" that actually were roads for four-wheeled vehicles. Those roads are a far cry from the actual single-track trails they had closed to responsible recreation."

For the new Bears Ears National Monument, Koontz states, it "encircles many 4WD roads, ATV trails and motorcycle trails where Ride with

Respect has worked. ... If history is any guide, these routes will eventually be closed due to the national monument status, despite the fact that we've made them sustainable, not to mention that they avoid archaeological sites."

However, the AMA believes some previous monument designations go beyond the "requirements and original objectives of the Act."

Moreover, these designations did not consider the multiple-use policy of section 102(a)(7) of the Federal Land Policy and Management Act (43 U.S.C. 1701(1)(7)).